

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

Walter Krantz,)	Civil Action #: 6:09-01623-HFF
)	
Plaintiff,)	
)	
v.)	
)	MOTION TO AMEND COMPLAINT
KLI, Inc. D/b/a KLI Global, Inc., f/k/a)	
Keller Ladders, Inc., f/k/a KUA Corp.,)	
f/k/a Keller Industries, Inc., a foreign)	
corporation,)	
)	
Defendant)	

Please take notice that pursuant to Rule 15(a) of the South Carolina Federal Rules of Civil Procedure, and with the consent of Defendant KLI, Inc., the Plaintiff hereby moves the Court for an Order allowing the Plaintiff to amend its Complaint to add as a party Defendant, Keller Industries, Inc. to this action. In addition, the Plaintiff, with the consent of the Defendant KLI, Inc., moves this Court to all amendment of the allegations against the Defendant KLI, Inc. A copy of the proposed amended Complaint is attached and incorporated herein.

THEREFORE, the Plaintiff respectfully moves this Court of an Order allowing him to amend his Complaint to add Keller Industries as a party Defendant to this action and to revise the allegations of the Complaint as to the Defendant KLI, Inc.

Respectfully submitted,

s/Douglas F. Patrick

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Attorneys for Plaintiff

October 1, 2009

Greenville, South Carolina

CERTIFICATE

This is to certify that the undersigned attorney for the Plaintiff did cause the Motion to Amend Complaint to be served upon the attorney for the Defendant, by mailing a copy of the same in an envelope addressed as shown below and depositing the same in the United States Mail, proper postage affixed thereto, on October 1, 2009.

Kurt M. Rozelsky, Esquire

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COVINGTON, PATRICK, HAGINS

STERN & LEWIS

s/Douglas F. Patrick

By: _____

Douglas F. Patrick